

June 21, 2017

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Mobility Fund Phase II: Area Eligibility and Challenge Process
WT Docket No. 10-208; WC Docket No. 10-90

Dear Ms. Dortch:

Wireless Partners is a small, veteran-owned, facilities-based wireless carrier operating 4G LTE/VoLTE in many rural and hard-to-serve areas. As was advocated in our reply comments to this proceeding¹, we urge the Commission to take all steps necessary to complete the process of identifying areas eligible for Mobility Fund Phase II (“MF-II”) as soon as possible,² and to ensure that the program continues to focus support on truly unserved areas.³

We concur with the Commission’s observation that it is crucial to “quickly transition away” from legacy support and conduct the MF-II auction without further delay.⁴ The Commission is already four years beyond the date when it committed to conduct the auction. Access to mobile broadband is essential to thrive in the 21st century and rural Americans cannot wait any longer to receive the public safety and economic benefits of this prevailing technology.

For the same reasons, we urge the Commission to retain the program’s focus “to target universal service funding to coverage gaps, not areas already built out by private capital.”⁵ If the Commission collects new data in order to determine which areas should be eligible for MF-II support, the Commission must ensure that the data collection identifies areas that are truly unserved. Support cannot be wasted on areas where wireless facilities already have been deployed, particularly with the very limited budget that is available for MF-II.

¹ Reply Comments of Wireless Partners, LLP, WT Docket No. 10-208 (filed May 11, 2017) at 1.

² See *Connect America Fund; Universal Service Reform – Mobility Fund*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 2152, 2154 ¶ 3 (2017) (“*Notice*”) (indicating that the Commission expects to complete the process of determining eligible areas by January 31, 2018).

³ *Id.* at 2156-57 ¶ 14.

⁴ *Id.* at 2235 ¶ 226.

⁵ *Notice* at 2156-57 ¶ 14.



We appreciate your consideration of these factors as you implement MF-II and thank you for your work on these important issues.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Parsloe", written over a large, stylized blue circular mark.

Robert Parsloe
President & CEO

cc: Hon. Ajit Pai, Chairman
Hon. Mignon Clyburn, Commissioner
Hon. Michael O'Rielly, Commissioner
Nicholas Degani
Jay Schwarz, Ph.D.
Rachael Bender
Claude Aiken
Amy Bender
Chelsea Fallon
Michael Janson
Kirk Burgee
Thomas Parisi